REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 20-26, 28-39, and 41-43 are currently pending in this application. Claims 20, 32, and 43 are independent. The remaining claims depend, directly or indirectly, from claims 20 and 32.

Claim Amendments

Claims 20 and 32 have been amended in to include the limitation "wherein subtitle data comprises at least one subtitle." Support for this amendment may be found, for example, on page 2, lines 29-30 of the Specification. No new matter has been added by the aforementioned amendment.

Rejection under 35 U.S.C. § 102

Claims 20-26, 28-39, and 41-43 stand rejected under 35 U.S.C. § 102(b) as being unpatentable over EP0802519 ("Chee"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The present invention relates to a method of processing video data in a receiver/decoder. Specifically, the present invention combines subtitle data, comprising at least one *subtitle*, with graphics data (*e.g.*, icons, logos, etc.) (*see* Specification, pages 18-19). Subtitle data is distinct from graphics data in that subtitle data is video *text*, while graphics data includes video *images*. In the present invention, graphics data is overlayed onto subtitle data and subsequently displayed

on a single completed subtitle page (*see* Specification, page 19, lines 1-5). Thus, a completed subtitle page comprises both subtitles as well as graphics data.

Further, the present invention divides a single memory area (*i.e.*, the graphics buffer region) into three sub-areas. Thus, all three sub-areas reside in the graphics buffer region (*see* Specification, Figure 5). Subtitle data is stored in a working buffer (*i.e.*, the first sub-area) and graphics data is copied from a third buffer sub-area into the working buffer, thus obtaining a complete subtitle page (*see* Specification, pages 18-19 and Figure 5). The graphics data is copied just before the subtitle page is to be displayed. To display the completed subtitle page, the role of the working buffer is interchanged with that of a display buffer (*i.e.*, the second sub-area).

Turning to the rejection of the claims, for anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. The Applicant respectfully asserts that Chee does not teach or suggest all the limitations of the amended independent claims for the following reasons:

(i) The amended independent claims recite: "storing subtitle data in a working buffer, wherein the subtitle data comprises at least one subtitle." Chee fails to disclose or suggest storing subtitle data. Rather, Chee discloses storing background data (1962) and storing overlay data (2062, 2064, 2066, and 2068) in the graphics memory (1960) (*see* Chee, Figure 20). Chee does not teach or suggest storing or displaying subtitle data. In fact, Chee is completely silent with respect to the term "subtitle."

(ii) The amended independent claims recite: "wherein the first buffer sub-area, the second buffer sub-area, and the third buffer sub-area are located in a graphics buffer region." Chee fails to disclose or suggest three distinct buffer sub-areas *within* the graphics memory. The

cited portion of Chee discloses that video stream "A" is copied from system memory into the graphics memory. Thus, the Examiner seems to be equating the system memory with the third buffer sub-area recited in the present claims. Chee clearly shows the system memory as a completely distinct memory from the graphics memory (*see* Chee, Figure 19). Further, Chee discloses that converted image "a" is written directly into the graphics memory (1960), where it is overlayed onto background display data (1962) and is displayed via display (14/24). Thus, Chee shows, **at most**, two buffer sub-areas in the graphics memory (*see, e.g.,* Figure 20 of Chee which shows a sub-area where the background data (1962) is stored, and the sub-area containing the overlay data). However, Chee fails to show *a third* buffer sub-area within the graphics memory region.

(iii) The amended independent claims recite: "copying the graphics data into the working buffer *just before* the working buffer becomes the display buffer." This allows the graphics data to trigger the completion of a subtitle page, which enables the page to be displayed (*see* Specification, page 18, lines 10-26). Chee clearly does not disclose this, as there is no time relationship between the double-buffering process and the process of converting and displaying the video stream "A" disclosed in Chee. In fact, Chee does not disclose or suggest any time frame for when the video stream "A" is copied into the working buffer, much less require that this copying occurs *just before* the working buffer becomes the display buffer.

In view of the above, it is clear that Chee fails to disclose or suggest each and every limitation of the amended independent claims. Thus, the independent claims are patentable over Chee. Further, dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/027001).

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Respectfully submitted,

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